

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**DEUTSCHE BANK TRUST COMPANY AMERICAS,**  
in its capacity as successor indenture trustee for certain  
Series of Senior Notes, *et al.*,

**Plaintiffs.**

Y.

**ADALY OPPORTUNITY FUND TD SECURITIES, INC.**  
**C/O ADALY INVESTMENT MANAGEMENT CO., et al.,**

**Defendants.**

**Case No.**  
1:11- cv-4784 (RJH)

**Rule 7.1 Disclosure  
Statement**

Pursuant to Federal Rule of Civil Procedure 7.1 and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Defendant Citadel Equity Fund LTD / Leeds Mgmt Svcs (Cayman) LTD c/o Citadel Investment Group LLC (a private non-governmental party) certifies that:

(1) Citadel Equity Fund LTD / Leeds MGMT SVCS (Cayman) LTD does not have any parent corporation.

(2) No publicly held corporation owns more than 10% of the stock of Citadel Equity Fund LTD / Leeds MGMT SVCS (Cayman) LTD.

Dated: September 13, 2011

Respectfully submitted,

/s/ Rachel Sims  
Rachel Sims  
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